1 SCOTT A. SUGARMAN (No. 68277) **SUGARMAN & CANNON** 44 Montgomery St., Suite 2080 San Francisco, CA. 94104 3 Telephone: (415) 362-6252 Facsimile: (415) 677-9445 4 Attorneys for Defendant 5 DEANDRE WATSON 6 7 IN THE UNITED STATES DISTRICT COURT 8 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 UNITED STATES OF AMERICA, No. CR 07-0336 WHA 11 Plaintiff, 12 STIPULATION TO CONTINUE APPEARANCE FOR STATUS v. 13 AND [proposed] ORDER MAURICE BIBBS and DEANDRE WATSON, 14 Defendants. 15 16 In this action, both defendants are charged with one count of carjacking (18 U.S.C. § 2119) 17 18 19

with the use of a firearm (18 U.S.C. § 924(c).) Mr. Bibbs alone was charged with one count of attempting to intimidate a witness (18 U.S.C. § 1512). The parties have recently been engaged plea negotiations. The parties have also set a briefing and hearing schedule for pretrial motions. This Court set this matter for entry of plea or status for January 22, 2008, in anticipation that either the plea negotiations would be completed or that the parties would know that no plea agreement was likely.

The parties will not have concluded their negotiations by January 22, 2008. Government counsel has been, and remains, involved in preparing a multi-defendant, gang case for trial, that is set to begin in early February 2008. He was involved in settlement discussions with defense counsel and Chief Magistrate Judge Larson throughout the day on January 17, 2008 and Chief

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1	Magistrate Judge Larson has continued those	discussions to January 22, 2008 at 2:00 p.m. Martin
2	Sabelli, counsel for Mr. Bibbs, has been involved in preparing pretrial motions in another complex	
3	case which are due January 18, 2008. As a result of these and other obligations, counsel has not	
4	been able to resolve all the differences between them. Counsel continue to try to do so and defense	
5	counsel continue to consult with their respective in-custody clients.	
6	Thus, the parties STIPULATE to continue the appearance for Status from January 22, 2008	
7	to January 29, 2008 at 2:00 p.m. Time has been excluded up to January 22, 2008. The parties	
8	further STIPULATE that time should be excluded until January 29, 2008 to allow for the effective	
9	preparation of counsel.	
10	The parties do not ask for any modification of the existing hearing date for pretrial motions	
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12	DATED: January 18, 2008	/s/Scott A. Sugarman
13		Attorney for Deandre Watson
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15 16	DATED: January 18, 2008	/s/ Martin Sabelli
17		Attorney for Maurice Bibbs
18	DATED: January 18, 2008	/s/
19	271122. January 10, 2000	William Frentzen Assistant United States Attorney
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21	So Ordered.	
22	DATE:	
23	DITE.	WILLIAM H. ALSUP UNITED STATES DISTRICT COURT
24		ONTED STATES DISTRICT COURT
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